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February 5, 1997

Amelia Wagner
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 1007-1866

FEB 07 1997

Re: Congoleum Corporation -- Diamond Alkali Site/
Passaic River Area Study
Our File No: 6378

Dear Ms. Wagner:

As you know, we represent Congoleum Corporation
("Congoleum") in the above matter.

We are continuing to work with Congoleum to compile
the information necessary to respond to the Section 104(e)
Request for Information previously served on Congoleum. We
will require more time to complete the response.

Unfortunately, there are no current Congoleum
employees with personal knowledge concerning the inquiries
made in your Request for Information. Accordingly, we are
attempting to identify former employees with relevant
knowledge and arranging to speak with them.

To date, we have learned the following.
Predecessors of Congoleum owned and operated a flooring
manufacturing facility in Kearny, New Jersey from the late
1880s to the early or mid 1970s, and maintained administrative
offices and a small laboratory at the site until the mid
1980s. The acreage of the facility changed over the years as
property was both purchased in parcels (at one time reaching
as many as 66 acres) and sold in parcels at different times.

The nature and type of flooring manufacturing
operations conducted at the Kearny facility suggests that the
only discharges into the Passaic River would have been non-
contact cooling water. As noted above, we are attempting to

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contact former employees with knowledge concerning the nature of any discharges into the river. We are also contacting the appropriate government agencies concerning the existence of discharge permits.

In addition, coal ash may have been spread on vacant land at the facility (as this was common at industrial facilities in the area), but we need to confirm or deny this possibility by speaking with former employees.

Some metal based pigments were likely used in the manufacturing process, but this needs to be confirmed or denied.

Manufacturing operations would have included straight-line linoleum and floor tiles.

We appreciate your understanding and will endeavor to complete and submit a formal response to the Section 104(e) Request for Information as soon as possible. Thank you for your cooperation.

Sincerely yours,

DUGHI AND HEWIT



Russell L. Hewit

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